was a perception on the part of veterans of the Hudson matter that the DNC – and specifically Fowler – was willing to request White House intervention (specifically by Ickes) on behalf of contributors in matters pending before the Administration, and even in connection with the discussion of specific contributions. This scenario also raises questions about the shared experience of Fowler and Collier, both in relation to Hudson and in their general course of dealing with the White House and Interior. Secretary Babbitt's former Chief of Staff apparently perceived that an appropriate means of lobbying his former agency was to make a contribution to the DNC and seek its intervention with Ickes and the White House, who then would contact Interior, instead of relying solely upon Collier's or the tribe's contacting Interior directly.²⁸⁰

3. Tribal Opponents Seek Assistance of Clinton/Gore Campaign

Contemporaneous with his efforts to solicit the assistance of the DNC and the White House in communicating the opponent groups' message to the Interior Department, Patrick O'Connor contacted the finance leadership of the Clinton/Gore '96 Committee ("the re-election campaign") for help in getting Ickes's attention. O'Connor seized opportunities stemming from the re-election campaign's solicitation of his support to raise the Hudson casino matter.

The leaders of the re-election campaign's finance staff were National Finance Chairman Terence McAuliffe and Finance Director Laura Hartigan. In 1994, McAuliffe had served as the

²⁸⁰Collier had, in fact, contacted DOI officials on behalf of the Shakopee on multiple occasions prior to June 4, 1996, including a December 1995 meeting attended by Crooks and Collier for the tribe, and Hilda Manuel, Michael Anderson and Robert Anderson for DOI, as well as a meeting that Gover recalls having with Collier. In a May 31, 1996, letter to Assistant Secretary Deer, Crooks wrote that the tribe was assured at that meeting "that the department viewed the adoption ordinance approval as final and had no intention of revisiting [it.]" Crooks's May 31 letter – and the June 4 DNC meeting – followed close in the wake of a May 10, 1996, letter from Deer to Rep. Elton Gallegly (R-Cal.) advising the Congressman that DOI was evaluating a request for reconsideration of the adoption ordinance.